

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION

IN RE:

CASE NO.

CAH ACQUISITION COMPANY #1, LLC  
d/b/a WASHINGTON COUNTY HOSPITAL,

19-00730-5-JNC

DEBTOR

CHAPTER 11

**BANKRUPTCY ADMINISTRATOR'S OBJECTION TO THIRD APPLICATION BY  
WALDREP LLP AS CO-COUNSEL FOR THE TRUSTEE FOR ALLOWANCE OF  
INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES [JUNE 1,  
2019 THROUGH NOVEMBER 30, 2019]**

**NOW COMES** the Bankruptcy Administrator for the Eastern District of North Carolina (“BA”), by and through her undersigned counsel, and respectfully objects to the Third Application by Waldrep LLP as Co-Counsel For The Trustee for Allowance of Interim Compensation and Reimbursement of Expenses [June 1, 2019 through November 30, 2019] (“Fee Application”); and, in support thereof, shows the Court the following:

1. This case was initiated by an involuntary chapter 7 petition filed on February 19, 2019. On March 19, 2019, an order allowing employment of Waldrep, LLP (“Waldrep”) was entered by this court.

2. The Fee Application was filed on February 14, 2020 requesting fees in the amount of \$142,712.00 and expenses in the amount of \$8,366.96.

3. The BA has reviewed the Fee Application and objects to the application as filed. The BA has been in communication with counsel about her concerns with the Application.

4. The BA requests the Court hold a hearing on this objection in approximately forty-five (45) days which will provide Waldrep an opportunity to supplement its fee application.

5. The BA reserves the right to amend this objection.

**WHEREFORE**, based upon the foregoing, the Bankruptcy Administrator respectfully objects to the Third Application by Waldrep LLP (“Waldrep”) as Co-Counsel For The Trustee for Allowance of Interim Compensation and Reimbursement of Expenses [June 1, 2019 through November 30, 2019], requests that the Court hold a hearing on this matter; and, requests such other and further relief the Court may deem just and proper.

Respectfully submitted, this 6<sup>th</sup> day of March, 2020.

/s/ Marjorie K. Lynch  
Marjorie K. Lynch  
Bankruptcy Administrator

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**CERTIFICATE OF SERVICE**

I, Tanya L. Aycock, of 434 Fayetteville Street, Suite 640, North Carolina, 27601, certify:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age.

That on this day, I served copies of the foregoing document electronically upon the following:

Thomas W. Waldrep, Jr. *served via: CM/ECF*  
Waldrep LLP

Jason L. Hendren *served via: CM/ECF*  
Hendren, Redwine & Malone, PLLC

I certify under penalty of perjury that the foregoing is true and correct.

Dated this 6<sup>th</sup> day of March, 2020.

Marjorie K. Lynch  
Bankruptcy Administrator

By: /s/Tanya L. Aycock  
Tanya L. Aycock  
Bankruptcy Analyst  
Bankruptcy Administrator's Office  
434 Fayetteville Street, Suite 640  
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